Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

June 7, 2013

VIA ELECTRONIC COMMENT FILING SYSTEM

Re: Applications of GCI Communication Corp., its wholly owned subsidiary Unicom, Inc. (collectively, "GCI") and ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc.(collectively, "ACS") for Consent to the Assignment of Licenses to Alaska Wireless Network, LLC; WT Docket No. 12-187

Dear Ms. Dortch:

GCI and ACS (collectively, the "Applicants") are submitting this ex parte letter to update the record regarding the competitive wireless market in Alaska and to urge the Commission to promptly conclude its extensive review of the applications pending in this proceeding. The following is respectively shown:

In the course of evaluating the pending applications, the Commission sought detailed information about the likely timing of Verizon's proposed launch of data services in Alaska following Verizon's acquisition of statewide spectrum in Alaska.¹ For the information of the Commission, Verizon has now publicly announced it will be launching 4G LTE data service in certain areas of Alaska on June 7, 2013.² This report confirms the information the Applicants put into the record indicating that Verizon's LTE entry into Alaska was anticipated in 2013.

Verizon's entry into Alaska signals the urgent need for the Commission to take immediate action on the pending applications in this proceeding. AT&T currently is the dominant mobile wireless carrier in the central core of Alaska with two-thirds of all non-Lifeline commercial wireless customers. The entry by Verizon, another "name brand" national carrier, makes it critical for GCI and ACS to be able to implement the competitive strategy that the Alaska Wireless Network ("AWN") infrastructure sharing arrangement proposes. Approving this transaction will equip GCI and ACS with the infrastructure, spectrum, technology and cost structure necessary to effectively compete with Verizon, AT&T and other long-established local carriers in Alaska (many of whom are collaborating with Verizon).

The Commission's review of the AWN transaction currently is on day 240 according to the Commission's Transaction Timeline,³ well past the Commission's own 180 day processing guideline, despite the fact that no petitions to deny were timely filed with respect to the applications. In contrast, the Commission has processed larger contested transactions of some of the major wireless

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¹ Letter from Ruth Milkman, Chief, Wireless Telecommunications Bureau, to Tamara Preiss, Verizon, WT Docket No. 12-187, Dec. 21, 2012.

² See Ben Anderson, After Long Wait, Verizon Rolls Out Data Service in Alaska, ALASKA DISPATCH (June 3, 2013), http://www.alaskadispatch.com/article/20130603/after-long-wait-verizon-rolls-out-data-service-alaska

³ http://transition.fcc.gov/transaction/gci-acs-awn.html;

carriers in far less time. ⁴ Three months ago, for example, the Commission approved the merger of the 4th and 5th largest mobile carriers in the country in 137 days, over significant objection and without imposing substantial conditions. This Commission should take the opportunity to approve this smaller transaction with the same urgency previously given to larger transactions. The consumers of Alaska deserve no less.

Kindly refer and questions in connection with this letter to the undersigned.

Very truly Yours,

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⁴ See Applications of Deutsche Telekom AG, T-Mobile USA, Inc., and MetroPCS Communications, Inc., For Consent to Transfer Control of Licenses and Authorizations, Memorandum Opinion and Order and Declaratory Ruling, DA 13-384 (Mar. 12, 2013) (approved on day 137 of shot clock); Applications of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC and Cox TMI, LLC for Consent to Assign AWS-1 Licenses, et al, Memorandum Opinion and Order and Declaratory Ruling, FCC 12-95 (Aug. 23, 2012) (transaction approved on day 180 of shot clock).